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Attorneys for Plaintiffs

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN MARIANA ISLANDS**

TIANMING WANG, *et al.*,

Plaintiffs,

v.

GOLD MANTIS CONSTRUCTION
DECORATION (CNMI), LLC, *et al.*,

Defendants.

Case No. 18-cv-0030

**STIPULATED SECOND
COLLECTION PROTOCOL**

Hearing Date: n/a

Hearing Time: n/a

Judge: Hon. Ramona V. Manglona

1. Plaintiffs and third-party witness Lijie Cui (“Cui”), by and through their counsel, agree to the terms of this Second Collection Protocol, dated November 16, 2021, concerning the review of the iCloud account purportedly belonging to Cui.

2. The parties agree that TransPerfect will seek to assess whatever data and information, including any backups, is available in the iCloud account.

1 3. TransPerfect, Plaintiffs, and Cui shall participate in a videoconference on Wednesday,
2 November 16, 2021 at 8:30 am (ChST), during which time Cui's current mobile phone will be present
3 to execute any two-factor identification. Depending on what TransPerfect sees in the iCloud account,
4 TransPerfect is authorized to conduct any or all of the following procedures: (a) log into the iCloud
5 account via a web browser, (b) sync the iCloud account to a sanitized phone to retrieve information
6 and data, (c) connect a forensic tool to any part of the iCloud account, or (d) any other procedures
7 deemed prudent to examine what information is available from the iCloud account. If additional
8 sessions are needed to perform the necessary procedures, Cui shall make her phone available so that
9 TransPerfect can log into the account.
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11 4. TransPerfect shall conduct an analysis ("Deletion Analysis") of whether any data was deleted
12 from the iCloud account or any significant changes were made to the account.
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14 5. TransPerfect shall be free to discuss with Plaintiffs both Cui's iCloud account or any other
15 aspect of this engagement.
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17 6. After completing its analysis, TransPerfect shall execute a declaration describing its findings
18 and submit it to Plaintiffs and Cui.

19 7. Cui agrees that she is responsible for any and all costs incurred in relation to this Second
20 Collection Protocol, pursuant to the Amended Preservation Order dated March 31, 2021. Cui
21 acknowledges that Mr. Langton of TransPerfect's hourly billing rate is \$355.00.
22

23 8. Plaintiffs shall be free to obtain any additional reports or affidavits from TransPerfect, or to
24 engage TransPerfect to testify in any proceeding, and Cui agrees to waive any and all objections on
25 any basis to such. Plaintiffs would bear the costs for these additional services, unless otherwise ordered
26 by a court or agreed to by the parties.
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28

1 9. Plaintiffs and Cui agree that this Protocol may only be modified with the written consent of
2 both parties or if ordered by a court.
3

4 **For Plaintiffs:**

5
6 _____/s/_____
7 Aaron Halegua, Esq.
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9 **For Lijie Cui:**

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11 _____/s/_____
12 Joey P. San Nicolas, Esq.
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14 IT IS SO ORDERED this ____ day of November, 2021.
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18 _____
19 RAMONA V. MANGLONA
20 Chief Judge
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